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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION
 DEVELOPMENT, LLC, a Delaware Limited
 Liability Company,

Plaintiff,

v.

REED HEIN & ASSOCIATES, LLC d/b/a
 TIMESHARE EXIT TEAM, a Washington
 Limited Liability Company; BRANDON REED,
 an individual and citizen of the State of
 Washington; TREVOR HEIN, an individual and
 citizen of Canada; THOMAS PARENTEAU, an

Case No.: **2:17-cv-03007-APG-VCF**

**STIPULATION AND ORDER TO
 EXTEND DEADLINE TO FILE REPLY
 IN SUPPORT OF MOTION TO
 COMPEL [ECF #278]**

[First Request]

individual and citizen of the State of Washington; HAPPY HOUR MEDIA GROUP, LLC, a Washington Limited Liability Company; MITCHELL R. SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES, an individual and citizen of the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a Washington Professional Services Corporation; and KEN B. PRIVETT, ESQ., a citizen of the State of Oklahoma,

Defendants.

Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A) (“FRCP”), Plaintiff Diamond Resorts U.S. Collection Development, LLC (“Plaintiff”), and Defendant Schroeter Goldmark & Bender, P.S. (“Defendant”) hereby stipulate to extend Plaintiff’s deadline to file a Reply in support of Plaintiff’s Motion to Overrule SGB’s Privilege and Work Product Claims and Compel Discovery [ECF #278] (the “Motion”), currently set for September 18, 2020, until September 25, 2020, and as grounds state as follows:

1. Plaintiff filed the Motion on August 11, 2020.
2. Defendant filed its Opposition on September 11, 2020, after a brief extension to its response deadline.
3. As the Court is aware, the question of whether the attorney-client and work product privileges apply in this case is a fundamental issue in discovery.
4. Defendant’s Opposition presents new documents, including a significant supplements to Defendant’s privilege log that were served concurrently with Defendant’s Opposition.
5. Plaintiff is diligently evaluating the newly-produced documents and is working diligently to draft its Reply, however will not be able to complete these tasks prior to the current deadline.
6. In order to adequately respond to Defendant’s Opposition, and the issues presented therein, the Parties agree that Plaintiff’s deadline to file its Reply in support of the Motion be extended one (1) week, up to and including September 25, 2020

1 7. This is the Parties' first request for extension of this deadline, and it is not
2 intended to cause any delay or prejudice to any party. Defendant does not object to the requested
3 extension.

4 Dated this 17th day of September, 2020

5 **GREENSPOON MARDER, LLP**

6 **LIPSON NEILSON, P.C.**

7 /s/ Phillip A. Silvestri
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13 Diamond Resorts Corporation

14 /s/ Megan H. Hummel, Esq. JOSEPH P.
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20 Vegas, NV 89144-7052

21 Attorneys for Defendant
22 Schroeter, Goldmark & Bender, P.S.

23 IT IS SO ORDERED

24 _____
25 UNITED STATES MAGISTRATE JUDGE

26 9-18-2020
27 DATED: _____
28

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system on this 17th day of September 2020. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the Court's Service List via transmission of Notices of Electronic Filing generated by CM/ECF. For any counsel or parties who are not are not authorized to receive Notices of Electronic Filing electronically, I certify that I served those parties via First Class U.S. Mail.

/s/ Phillip A. Silvestri

An employee of Greenspoon Marder LLP

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